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Attorneys for Defendant
TALKSPACE, INC.

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

COURTNEY MITCHENER,
individually, and on behalf of all others
similarly situated,

Plaintiff,

v.

TALKSPACE NETWORK LLC, a New
York Limited Liability Company; and
DOES 1 through 25, inclusive,

Defendant.

Case No.: 2:24-cv-07067-JAK-BFM

[Hon. John A. Kronstadt]

**REPLY DECLARATION OF
KAMRAN B. AHMADIAN IN
SUPPORT OF DEFENDANT
TALKSPACE, INC.'S MOTION
FOR SANCTIONS PURSUANT TO
FED. R. CIV. P. 11**

*[Filed concurrently with Reply Brief
and Evidentiary Objections]*

Hearing Date: April 21, 2025
Hearing Time: 8:30 a.m.
Dept: 10C

Case Filed: August 20, 2024

DECLARATION OF KAMRAN B. AHMADIAN

I, Kamran B. Ahmadian, declare as follows:

1. I am an attorney duly licensed and authorized to practice before this Court. I am an associate in the law firm of Baker & Hostetler LLP, attorneys for the Defendant Talkspace, Inc. (incorrectly named in the Complaint as Talkspace Network LLC) (“Defendant” or “Talkspace”). I have personal knowledge of the facts stated below and if called to do so, I could and would competently testify as follows.

2. This Declaration is submitted in support of Talkspace’s Motion for Sanctions Pursuant to Fed. R. Civ. P. 11 (“Motion”).

3. On November 5, 2024, Talkspace served Plaintiff’s Counsel via email with a copy of a similar Rule 11 motion, which included the same declaration of Mr. Vint that was filed in connection with Talkspace’s Motion.

4. On November 6, Mr. Tauler replied to my email. A true and accurate copy of this November 6, 2024 email correspondence is attached hereto as **Exhibit B**.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed this 28th day of March 2025, at Los Angeles, California.

/s/ Kamran B. Ahmadian
Kamran B. Ahmadian

EXHIBIT B

From: [Robert Tauler](#)
To: [Ahmadian, Kamran](#)
Cc: [Narain Kumar](#); [Lukitsch, Bethany](#)
Subject: Re: Courtney Mitchener v. Talkspace Network LLC et al (2:24-cv-0767-JAK-BFM): Letter Re Motion for Sanctions Pursuant to Federal Rule of Civil Procedure 11
Date: Wednesday, November 6, 2024 3:32:40 AM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)

[External Email: Use caution when clicking on links or opening attachments.]

"Fiddler Everywhere?" Are you serious dude? Please file this!

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On Tue, Nov 5, 2024 at 6:18 PM Ahmadian, Kamran <kahmadian@bakerlaw.com> wrote:

Robert and Narain,

Please see the attached Letter regarding Talkspace's Rule 11 Motion for Sanctions. A copy of the draft Motion has also been sent via First Class U.S. Mail. As always, we are happy to meet and confer at your convenience.

Thank you very much.

Kamy Ahmadian
Associate



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